

1 MELANIE D. MORGAN, ESQ.  
2 Nevada Bar No. 8215  
3 SCOTT R. LACHMAN, ESQ.  
4 Nevada Bar No. 12016  
5 **AKERMAN LLP**  
6 1635 Village Center Circle, Suite 200  
7 Las Vegas, NV 89134  
8 Telephone: (702) 634-5000  
9 Facsimile: (702) 380-8572  
10 Email: melanie.morgan@akerman.com  
11 Email: scott.lachman@akerman.com

12 *Attorneys for Bank of America, N.A.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 BIG ROCK ASSETS MANAGEMENT LLC, a  
16 Nevada limited liability company,

17 Plaintiff,

18 v.  
19 MTC FINANCIAL INC. DBA TRUSTEE  
20 CORPS, a California Corporation, BANK OF  
21 AMERICA, N.A., a national association; DOES  
22 I-X, inclusive,  
23 Defendants.

24 Case No.: 2:22-cv-01212-APG-NJK

25 **STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

26 **(SECOND REQUEST)**

27 Big Rock Assets Management, LLC and Bank of America, N.A. (**BANA**) stipulate that  
28 BANA shall have an additional thirty (30) days, up to and including **November 16, 2022**, to file its  
response to Big Rock's complaint, which is currently due on October 17, 2022.

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 - FAX: (702) 380-8572

Good cause exists to grant the requested extension since the parties are engaged in settlement negotiations with respect to this case and other cases pending in the court. *See Big Rock Assets Management, LLC v. National Default Servicing Corporation*, No. 2:22-cv-00909-CDS-DJA; *Big Rock Assets Management, LLC v. National Default Servicing Corporation*, No. 2:22-cv-01543-APG-EJY. The parties are attempting to reach a global settlement and additional time is needed to discuss settlement among multiple counsel, the parties, and other interested entities. Incurring fees related to a response could impact a potential settlement.

1        This is the parties' second request for an extension of this deadline and is not intended to  
2 cause any delay or prejudice to any party.

3        DATED this 11th day of October, 2022.

4        **AKERMAN LLP**

5        /s/ Scott R. Lachman  
6        MELANIE D. MORGAN, ESQ.  
7        Nevada Bar No. 8215  
8        SCOTT R. LACHMAN, ESQ.  
9        Nevada Bar No. 12016  
10      1635 Village Center Circle, Suite 200  
11      Las Vegas, NV 89134

12      *Attorneys for Bank of America, N.A.*

13        **ANDREW BAO & ASSOCIATES**

14        /s/ Andrew A. Bao  
15        ANDREW A. BAO, ESQ.  
16        Nevada Bar No. 10508  
17        8020 S. Rainbow Boulevard, Suite 100-163  
18        Las Vegas, NV 89139

19      *Attorneys for Big Rock Assets Management, LLC*

20      **IT IS SO ORDERED.**

21        
22      UNITED STATES MAGISTRATE JUDGE

23      **DATED:** October 13, 2022

24      **AKERMAN LLP**

25      1635 VILLAGE CENTER CIRCLE, SUITE 200  
26      LAS VEGAS, NEVADA 89134  
27      TEL.: (702) 634-5000 - FAX: (702) 380-8572